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Riffel, Rodney

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ABSTRACT

This monograph looks at the legislative requirements for coordination between the Vocational Education Act of 1963 (VEA) and the Comprehensive Employment and Training Act of 1973 (CETA). It describes attempts at coordination with vocational education by CETA's most significant antecedent, the Manpower Development and Training Act of 1962. Complex dimensions added to the relationship between federal education policy and employment and training policy by CETA's creation are then explored. Mechanisms for coordinated planning as specified in the Education Amendments of 1976 and administering the planning requirements are described. A discussion of developing strategies for coordination takes into consideration the reinforcing effects of the Youth Employment and Demonstration Projects Act, effects of the set-aside funds that required school system agreement, and the agreements process. Next, the reauthorization of CETA in 1970 is described--an act that resulted in refinement of CETA's relationship with vocational education. The flow of funds from CETA to education programs is also addressed. Pooling resources is considered as one way to view coordination. A discussion of solving coordination problems and making coordination feasible follows. (YLB)

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Coordinating Federal Programs: Vocational Education and CETA

Rodney Riffel

U.S. Department of Education

T H Bell, Secretary
William Cloahan, Under Secretary

Office of Educational
Research and Improvement

Donald J. Senese, Assistant Secretary

National Institute of Education

Milton Goldberg, Acting Director

Marc Tucker, Associate Director

Educational Policy and Organization

Henry David, Project Director
Vocational Education Study

Washington, D.C. 20208

August 1981

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Vocational Education Study Publication No. 7

FOREWORD

The Vocational Education Study Project has already stated its intention to publish papers, accounts of inquiries, and results of selected research projects emerging from its work. These publications are in addition to The Interim Report on the Study, which the National Institute of Education transmitted to the President and to the Congress, and to The Final Report, scheduled to be transmitted by September 30, 1981, as the Education Amendments of 1976 require.

Coordinating Federal Programs: Vocational Education and CETA is the Vocational Education Study's seventh publication. It is the product of one of several research efforts undertaken by members of the Vocational Education Study staff. This publication looks at the legislative requirements for coordination between the Vocational Education Act of 1963, as amended, and the Comprehensive Employment and Training Act of 1973, as amended. It describes attempts made to interrelate the two, and analyzes the nature of the problems associated with realizing legislative mandates for coordinating Federal policies with different aims, programmatic instruments, and administrative mechanisms. Both pieces of legislation face reauthorization, and this monograph provides information on what has been accomplished through previous statutory provisions designed to effect coordination. In addition, it also has implications for Federal human resources policy broadly conceived.

Henry David
Study Director

Gerry Hendrickson
Study Project Assistant Director

PREFACE

The implementation of perceived solutions to social problems is one of the more difficult tasks in the domain of public policy. Mounting an attack upon poverty, seeking to reduce unemployment, or protecting civil rights, for example, are complex and uncertain activities whose goals are not only more easily stated than are the means for realizing them but may also be frustrated or defeated by the ways in which the means are implemented.

Laws are seldom finely tuned devices. While the goals of legislation may be achieving a particular strategy or coordinating and integrating strategies, the result is more often than not discord and confusion, rather than a well-planned synergy. Such an outcome is not necessarily caused either by the legislation or by the administrative interpretations of what a law is perceived to be achieving.

Laws have histories, and the intent of any statute may be subject to change in the course of its development. As in any evolutionary process, lags in implementing the intent of the law may occur, especially among the managers of the legislation, those who administer it at various levels of government, and those for whom it was enacted. These relationships are not systematic, static, or simple, and may in fact be an argument for conceiving of policies as being roughly honed, rather than fine-tuned and having coarse rather than subtle effects. Furthermore, when a piece of legislation attempts to remedy a social problem and create additional changes in the intent of that law, the web of interactions becomes all the more complex.

These observations are clearly illustrated by the story of the Vocational Education Act of 1963, as amended, and its relationship to the Comprehensive Employment and Training Act of 1973. That history

has been recorded in a variety of forms--oral as well as written. This paper attempts to piece together that history in order to learn what lessons it might hold for further reauthorizations.

I would like to thank the many persons who have criticized and commented on the various drafts of this paper. These include Dr. Henry David and the members of the Vocational Education Study Staff, Kathleen Hug of NIE's Publications Office, Robert Eckert of Semerade Associates, Michael Brown of the U.S. Conference of Mayors, Curt Aller of the Center for Applied Manpower Research, and William Mrenhoff of the Bureau of Social Science Research. The ideas and opinions expressed, however, are those of the author and do not necessarily represent the views of any of these individuals, the National Institute of Education, or the U.S. Department of Education.

Rodney Riffel

Vocational Education Study

August 1981.

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COORDINATING FEDERAL PROGRAMS: VOCATIONAL EDUCATION AND CETA

The relationship between the Vocational Education Act of 1963, as amended, henceforth referred to as the VEA, and the Comprehensive Employment and Training Act of 1973, commonly referred to as CETA, is a complex one that has been developing for nearly two decades. While the legislative structure of this relationship has undergone many changes during that time, much of the activity resulting from these changes has been generated by factors outside the law, such as the behavior of public employees and government agencies and their perceptions of the goals of the legislation. However, the story is much more than a chronicle of the education and the employment and training communities. It illustrates fundamental problems in attempting to derive a Federal policy for resolving a perceived social problem that involves many participants.

The Evolution of Vocational Education and Manpower Programs

Both vocational education and manpower (more recently renamed employment and training) programs are placed within the area of policy commonly referred to as human resources. Here the similarity between the programs ends. While both are concerned with the development of individuals, the programs have different goals and operate under very different circumstances. Moreover, the relationship between vocational education and CETA has undergone several transformations during a history that began before either piece of legislation existed in its current form. The most significant antecedent was the Manpower Development and Training Act of 1962 (MDTA). The relationship established then has not been forgotten by current practitioners, who often refer to it as an ideal.

Prelude to the Education Amendments of 1976

The Manpower and Development Training Act was administratively

analogous to the VEA, particularly in containing mechanisms for providing financial assistance to the States. While the VEA provides funds solely for vocational education, the original MDTA had a Title II, "Training and Skills Development Programs," with a Part A entitled "Duties of the Secretary of Labor," and Part B entitled "Duties of the Secretary of Health, Education, and Welfare."¹ The Secretary of Labor was to make referrals to the Secretary of Health, Education, and Welfare for individuals with such needs as occupational training, job counseling and testing, and the basic educational training. The DHEW Secretary, in turn, was to make agreements with State vocational education agencies to provide occupational training and with other State agencies to satisfy other needs. State vocational education agencies were thus an integral part of the Federal strategy, although the Congress did offer a cautionary note: The influx of MDTA dollars was not to allow the States to reduce their levels of funding for vocational education and training provided by the Smith-Hughes Vocational Education Act or the Vocational Education Act of 1946, a process formally referred to as "maintenance of State effort."² This point was the sole cross reference by MDTA of federally supported vocational education programs.

This language established a precedent for the administration and the coordination of programs, the vestiges of which still exist despite changes in these laws. The first attempt at coordination between the laws was unique for its administrative clarity. First, authority and responsibility were specifically allocated. Although the labor community, more specifically the Department of Labor, was the senior partner under MDTA, it was operated as a joint program. In-school training programs were the province of the Department of Health, Education, and Welfare; out-of-school programs were under the jurisdiction of the Department of Labor.³ To facilitate these efforts, the DHEW's Office of Education (OE) established a Division of Manpower Development Training.

Second, the interaction between manpower and education legislation was, for programmatic purposes and unilateral in direction. Coordination was referenced through employment and training policy, not vocational education policy.

Finally, the MDTA formulated two approaches that presaged concerns of the late seventies. The first was purely administrative: cooperation was to occur through agreements among the various agencies or programs that provided vocational education and training. The second established what can be best described as a functional perspective toward education: different kinds of education such as occupational training and basic skills instruction were necessary for manpower development, which, on the State level, were functions administered by different agencies. At no point in what was to become a rapidly evolving relationship between education and employment and training policy was the cooperative relationship more clearly defined than under the original MDTA. MDTA invoked a Federal-State partnership. DOL, through its State and local counterparts, tested and referred individuals to local education agencies (LEAs). DHEW, through its State vocational education bureaus and LEAs, conducted the training. Upon the completion of training, the Employment Service was responsible for placements.

In the middle sixties, as coordination with vocational education and MDTA was being attempted, two questions were being asked: The first bears indirectly on coordination: What mix of basic skills instruction and vocational training is necessary for obtaining employment? The second directly relates to the organization of coordinated programs: Who should conduct that training? Although both questions still remain unanswered today, they have appeared in varying reincarnations in the ensuing 20 years. In fact, the history of coordination between education and manpower programs can be summarized as successive attempts to answer these questions.

Instruction in basic education has long been viewed as the primary task of public education. Therefore, it was not surprising that in the early days of MDTA the concept of the skills center, which combined basic skills instruction with occupational training, emerged from the OE's Office of Manpower Development and Training. These centers, along with projects providing group or class instruction, and an individual referral program, were the three types of training projects provided under MDTA.⁴ On-the-job training was another program that had increased popularity during MDTA.

In the middle and late sixties changes occurred in both pieces of legislation. The Manpower Development and Training Act originally had been designed to serve those individuals whose occupations were expected to become technologically obsolete and to train individuals for vital occupations where critical shortages were projected. The 1965 amendments added a focus on the unemployed and on providing "brief refresher or reorientation education and courses for further employment."⁵ At the same time the Federal Government, as part of President Lyndon Johnson's Great Society program, was establishing a series of separate employment and training policies (such as the Economic Opportunity Act of 1964) to serve the economically disadvantaged. MDTA was also redirected to serve this population, and was given responsibility for many of these programs, such as the Job Corps, which had been housed in the Office of Economic Opportunity. These programs thus gained a uniform administrative base in the DOL. They were also similar policies, and as such they were connecting or counterbalancing in intent. Moreover, they represented pieces of what, in retrospect, appears to have been a trend in the development of a Federal human resources policy: a concern for providing remedial or compensatory services.

With the shift in MDTA toward targeting programs to disadvantaged individuals, questions regarding training tactics began to be raised.

The different employment and training needs of different populations suggested that there was no one best method of education for meeting those needs. This inevitably involved a review of those organizations conducting the training programs when MDTA was reauthorized in 1968.⁶

The administrative correlates of these issues remain some of the most visible concerns of current coordination efforts. Academic credit for work experience, the substance of nonfinancial agreements, and even the content of management information systems all derive from programmatic concerns regarding the type of training and the type of preparation needed for employment and, as well, who should provide this training.

While the role of education had historically been quantitative (i.e., providing access to education to large numbers of individuals), in the sixties the Federal role became increasingly qualitative. The Federal Government no longer focused principally on providing access to general educational facilities and services to large numbers of individuals. That goal had been accomplished, at least for the majority of the population. The new target of Federal concern was those populations, the disadvantaged and later the handicapped, whose educational needs were special or compensatory. The enactment of the Elementary and Secondary Education Act of 1965 was thus a major precedent, not only in terms of targeting funds to special populations, but also in terms of increasing the Federal role in education; which, by the tenth amendment to the Constitution, is a State and local function. Likewise, in 1963 and again in 1968, the Federal vocational education legislation underwent major changes. This legislation had traditionally focused on curricular and programmatic areas, such as agriculture and homemaking education. The Congress began adding social policy dimensions by amending the legislation to include a focus on special target populations--the handicapped and the socioeconomically and the

academically disadvantaged. This trend continued. In the Education Amendments of 1974, limited English-speaking persons joined the list of special needs populations, and a bilingual vocational training program was added to the VEA legislation.⁷

The creation of the Elementary and Secondary Education Act and the addition of social policy dimensions to the Vocational Education Act were not independent actions by the Congress. Because both pieces of legislation were prepared by the same Congressional subcommittee, themes within one statute were bound to have some influence on the other. It appears that from a Congressional perspective, the Federal role in education was to supplement and counterbalance the roles of State and local agencies. On the other hand, the major professional association and lobby group for vocational education, the American Vocational Association (AVA, formerly known as the National Society for Promotion of Industrial Education, which was instrumental in lobbying for the first vocational education legislation in 1917), had created a manpower division when MDTA was passed. It remains organized by curricular areas; rather than by target populations or social concerns.

Consensus on the goals of vocational education differs among the various parties responsible for its development, management, and use. The perceptions as to its role and purpose are many. The lack of singularity of purpose for vocational education among its vested interests continues to have ramifications for its coordination.

Adding a Complex Dimension to the Relationship

Creating the CETA system. The Department of Labor's Comprehensive Employment and Training Act was passed in 1973, and with its creation the relationship between Federal education policy and employment and training policy became more complex. CETA absorbed the manpower

programs of the previous decade,⁸ and shifted control over employment and training programs from Federal to local authorities.

The local officials who ran the CETA programs were not inexperienced for this new task. The Federal government had provided them training for their new role through various Great Society programs. They had also gained experience from the Consolidated Area Manpower Planning System (CAMP) created in 1967, which laid the groundwork for the local planning required under the CETA system.

CETA is often referred to as one manifestation of the "New Federalism" since it gave funds directly to localities, referred to as prime sponsors, and left decisions on the uses of those funds largely in their hands. With local politicians making the decisions about Federal employment and training dollars, and with a large part of revenues bypassing State agencies, the administrative link between public education and the Department of Labor was broken. Moreover, unlike MDTA, which essentially spoke of education generically, CETA was more selective in its view of education. Education's role became more specialized, as evidenced by references in the legislation to the Commissioner of Education, community colleges, local education agencies, and vocational education and training facilities, to name a few. The prime sponsors developed written agreements with a variety of training facilities to serve a variety of populations. This strategy remains the fundamental strategy for deploying resources in the CETA system, even though it is the reverse of Federal assistance to public education, where contractual relationships are more the exception than the rule.⁹

Education's new role. The 1973 CETA legislation went beyond mere program operation in encouraging collaborative planning. State Boards of Vocational Education were to be represented on the State Manpower Services Councils (SMSCs), and the prime sponsors' plans for

application were to include "a description of the manpower needs of local governments and of local education agencies within the area to be served together with the comments of such agencies where appropriate...." 10

The 1973 version of CETA did not refer to the Vocational Education Act of 1963, as amended. The most prominent mention of vocational education in the CETA legislation is found in Title I, "Comprehensive Manpower Services." Section 112 of that title, "Supplemental Vocational Education Assistance," mandates that 5 percent of the funds available to the Secretary of Labor are to be made in "grants to Governors to provide financial assistance through State vocational education boards, to provide needed vocational education services in areas served by prime sponsors." This section is the only one that mandates that Federal funds from CETA programs be directly applied to vocational education programs. While education, and for that matter vocational education, receives frequent mention in the CETA legislation, other funds are permitted but not mandated for education programs. The 5 percent was intended to assure participation of the State vocational education system in CETA, but not to replace local efforts. The unique feature of this 5-percent set aside is that the funds go through the States, not directly to the local level, which departs from the philosophy of the "New Federalism."

The administration of these monies is not simple. CETA funds are first allocated to the Governors. Although they may keep a small percentage for administration if they so choose, they in turn notify in writing the State vocational education board and each prime sponsor of the funds available within a prime sponsor's area. The prime sponsor then develops a nonfinancial agreement with the State vocational education board planning for the expenditure of the funds from the Governor by the State vocational education board in the prime sponsor's area.

The 1973 version of CETA made one additional requirement of some historical note in considering the 1976 Education Amendments. Section 584 of the CETA legislation created the National Commission for Manpower Policy and charged that body with reviewing problems in coordinating CETA with other related programs. While the Vocational Education Act was not specified in the legislation as a related program to consider, it was discussed in the Commission's report, which observed:

Overall there is little evidence of coordination between CETA and vocational education programs. Since both programs provide manpower services and have considerable overlap on clients they serve, closer coordination in planning and service delivery seems essential.¹¹

The report added that the regulations proposed by HEW requiring State Manpower Service Council review and comment on State vocational education plans would be a step in improving coordination.

Prior to enactment of the Education Amendments of 1976, the vocational education legislation recognized employment and training legislation, but only in a nominal manner and for purposes of administrative procedure and of preventing the comingling of funds. Thus, the Vocational Education Act of 1963 noted that a basic VEA grant to a State could not be used for vocational education under MDTA.¹² When bilingual vocational programs were introduced in the Education Amendments of 1974, the legislation stipulated that: "The regulations and guidelines...shall be consistent with those...pursuant to Sec. 301 (b) of the Comprehensive Employment and Training Act of 1973...."¹³ Serious attention to the coordination between CETA and vocational education legislation first appeared in 1976 when CETA and VEA were jointly amended to include interlocking council memberships. This remains the only instance of a joint or uniform mandate between these two Federal programs.

The 1973 CETA legislation saw a change in the relationship between DHEW and DOL, beginning with a lengthy memorandum between the two agencies clarifying their roles with respect to the legislation.¹⁴ This led a few months later to the establishment of an Office of Manpower within OE's Bureau of Occupational and Adult Education.¹⁵

Developing technical assistance. As the Federal Government's administrative component was being developed, so were a series of documents setting forth technical assistance for program coordination. While not required by the legislation, a number of papers were prepared by various agencies that explored a variety of planning issues and the rudiments of coordinated planning. These aids became more prevalent when MDTA and a series of other manpower programs were combined in the Comprehensive Employment and Training Act of 1973. Although these papers, for the most part, describe programs that no longer exist, they are noteworthy in presenting the first stages of Federal thinking on how coordination might be planned. Moreover, efforts to disseminate information on program coordination were not limited to one Federal agency. Both DOL and DHEW are represented in the literature.¹⁶ One document presaged current thinking by developing for manpower planning a matrix of 43 HEW programs cross-referenced with services offered by CETA.¹⁷ Another spoke candidly to a fact, often ignored in today's coordination efforts, that would resurface in the 1976 amendments and later CETA legislation:

Coordination for its own sake has no particular value. What matters are the results of the coordination and how they serve the interest of all concerned.¹⁸

Coordination, as viewed by the Congress, has never been an end, but rather a means to meeting the needs of individuals for education and training for employment. It is highly likely that in some instances coordination may not be necessary or preferred. This point, essentially a question of strategy, has often been forgotten in the attempts by the administration to implement the legislation.

New administrative concerns. The change from MDTA to CETA, with the consolidation of several employment and training programs, saw a greater change in the administration of training programs than in the types of programs. Within the education community, the change was initially more difficult for State officials than it was for LEAs since the States were no longer a major recipient of Federal employment and training funds. The fact that dollars were awarded by competitive contract, rather than exclusively, created the same tension later on the local level since public education was not automatically written into the CETA legislation.¹⁹ Prime sponsors were free to choose who they wished to fund. The problem for vocational educators was characterized by one study as "unlearning MDTA."²⁰

Under MDTA, State agencies had had a central role in employment and training programs, but the decentralization of the administration of these programs under CETA led to a declining role of State agencies in dispersing Federal funds. By 1977, a 17 percent decrease from 1975 levels was noted in the share of the Governors' special CETA funds given to State agencies. State agencies, rather than local ones, still administered the largest share of the Governors' funds (45.9 percent of the total dollars available to the Governors).²¹ The change was not rapid, but the influence of local governments, community-based organizations, and similar organizations over funds that had been previously allocated to State units was increasing. Moreover, the Governors, serving in the role of balance-of-State prime sponsors, had additional monies available to them. Further, the governors' use of the request for proposal (RFP), as an administrative procedure for dispensing funds, caused the observation that: "The RFP process, which promotes competition among agencies, does not lend itself well to such complex intergovernmental arrangements."²² Deemphasizing the State agencies and the resulting decentralization of dollars represented a form of competition among organizations for those dollars.

This change illustrates a central problem to efforts to promote coordination. Policies that attempt to be complex can also be equally insensible. While any comprehensive approach to coordinating Federal-human resources policy assumes coordination in the administration of education and employment and training programs, the problem of competition is inherent. It stems from the question of how resources should be allocated. A comprehensive policy depends on a number of organizations or agencies for its implementation. And the number of organizations involved will have an effect on the proportional share of resources allocated to each organization. Increasing the number of participants may have a rationale for sound policy planning, but it can have dysfunctional effects on implementation of the same policy. Whether or not the resources change accordingly, increasing the number of participants necessarily creates competition for those resources. When changes do occur, it is not easy to determine whether the effect on the implementation of the policy is direct or indirect, but it is not hard to notice when the change occurs.

The transition from MDTA to CETA saw an increase in the role of community-based organization (CBOs) in providing training programs which had closer ties to disadvantaged and minority populations than more established institutions such as schools. CBOs such as the Urban League and Ser-JOBS for Progress, Inc. ran training programs; the flow of funds to CBOs for these programs increased under CETA.²³

CBOs also had close ties with local political networks. The transition to a decentralized Federal policy, with an increased local role in deciding how funds were to be spent, added to the increased role of CBOs in providing training services. But the CBOs were more than alternative organizations for providing programs. They also delivered alternative vocational curricula, as exemplified by Career Intern Program of the Opportunities Industrialization Centers of America.

The targeting of Federal programs to the disadvantaged and other special populations highlighted a consideration relevant to formulating strategies for providing training: alternatives to public education programs and organizations may be necessary to prepare special populations for employment. For some groups access to the labor market might not be best facilitated by the traditional means of preparation offered by the public schools--the usual means of entrance being programs run by those institutions. The Federal Government had already led in this break with tradition by establishing under MDTA the skill centers, which had open entry-open exit programs that changed both the time required for enrollment in the schools and the nature of instruction.²⁴ A paradox was thus emerging: The attempt to develop a comprehensive employment and training policy was increasing the competition for Federal dollars among the very organizations from whom coordination was deemed desirable. Decentralization of administration offered by CETA also led to diversification among various deliverers and administrative components of that policy. As more organizations became involved in the delivery of vocational education programs, the role of public vocational education institutions became more refined. The delivery system thus became more complex. Any consideration of coordinating vocational education with the CETA system required the identification of vocational education as a curriculum, a program, or an organization. The Education Amendments of 1976 required a fourth clarifier: planning.

Introducing Coordinated Planning

The Education Amendments of 1976

The Education Amendments of 1976²⁵ moved toward a new stage in the development of a coordinated Federal human resources policy between vocational education and CETA programs. The formal language, introduced in the VEA and in the subsequent amendments to CETA, specified

coordinated planning between programs sponsored by the two acts.

Perceptions about what is coordination to accomplish were many, and most departed from the language of the joint mandates introduced in the 1976 Education Amendments. At no point during the reauthorization hearings was coordination with CETA mentioned as a strategy for serving the disadvantaged, nor is this contained in the legislation. Moreover, the issue of duplication of services is not addressed in the legislation. Program coordination was viewed by the Congress as a function of planning, and the mandates for planning address only the use of resources. But the specific resources to be coordinated are not discussed. Beyond the mention of a joint planning effort, no value or judgment is attached to actual coordination efforts that emerged. Coordination as mandated is neither desirable nor necessary. Although the amendments specified an administrative mechanism to coordinate planning, the Congress did not specify what the substance of the coordination effort was to involve.

The mechanisms for joint planning, which are mentioned at several places in the legislation, are largely a function of State governments. Both the 1976 Education Amendments and subsequent 1976 amendments to CETA, require an interlocking membership or a joint representation between the State Advisory Council for Vocational Education (SACVE) and the State Manpower Services Council (SMSC, which in the 1968 amendments to CETA became the State Employment and Training Councils, SETC). The 1968 amendments to the vocational education legislation had already required that a member of the State Boards of Vocational Education serve on the SMSCs. So the formal cross-linking of advisory bodies is the real innovation. These groups are to comment on each other's annual reports and to "Assess the extent to which vocational education, employment training, vocational rehabilitation, and other programs under this and related Acts represent a consistent, integrated, and coordinated approach to meeting such needs."²⁶ This language is

incorporated in a parallel mandate that is given jointly to the National Advisory Council on Vocational Education (NACVE), and the National Commission on Employment Policy (formerly the National Commission on Manpower Policy),²⁷ both of which have a mandated interlocking membership. The two statutes do not specify what "consistency, integration, and coordination" mean.

Further, although the regulations for the VEA state that there is to be no duplication of services between CETA programs and those sponsored by Federal vocational education monies, neither the regulations nor any subsequent documents issued by the Federal government elaborate on "duplication of services."

The Congress further mandated the establishment of a National Occupational Information Coordinating Committee (NOICC) to create a common language of information on program data and employment data to "improve coordination between, and communication among, administrators and planners of programs" authorized by the VEA and CETA.²⁸ NOICC also provides funds for a State Occupational Information Coordinating Committee to perform similar functions on the State level. It is presumed such information will be of assistance to the States in preparing annual and 5-year plans; especially with reference to the mandate given to the State Boards of Vocational Education to show the criteria used for coordinating vocational education programs with CETA's prime sponsor established training programs.²⁹

The fact that the VEA and the CETA have different funding, and planning cycles is not recognized by the laws or the accompanying regulations. This makes any attempt for planning at best difficult. Since both the vocational education enterprise and CETA system are administratively diffused and decentralized, the joint planning exercises can be nothing more than a recognition of the activities of the other, rather than joint schemes on the distribution and use of resources.

This, in fact, has been borne out in actual program administration.

Administering the Planning Requirements

Characteristics of the two systems. CETA and federally-funded vocational education programs do not share parallel administrative procedures either for planning or for channeling resources to initiate programs on the local level. In vocational education, where the knowledge of Federal funding is known a year in advance and where the Federal dollars are matched by State and local governments at a ratio of 10 to 1, preparing a plan for the use of Federal monies is the duty of an administrative entity, separate from other State education agencies, commonly called a State Board. While the structure of that board may vary from State to State, it has a common function in what the VEA refers to as "sole responsibility."³⁰ A radical change occurs in the administration of vocational education programs from the State to local level. On the local level, public vocational education is administered largely by community colleges and LEAs, and is generally perceived as a curriculum offering. While the local program may have a local director or a person responsible for programming, budget and planning authority reside with the educational organization responsible for the program. This leads to different perceptions of vocational education and produces a shift in perception which is crucial for understanding what happens when attempts are made to coordinate programs.

CETA administrators, for the purposes of coordination, and in keeping with their legislation, distinguish vocational education as a curriculum, an organizational, programmatic, or planning-resource. Their ability to purchase vocational education depends entirely on Federal funds, which are not forward funded. The CETA system is divided into approximately 500 administrative units (the prime sponsors), which include State-level components known as balance-of-State primes and run by the Governors, but composed largely of county and city units or

combinations referred to as consortia. While the SETCs, which are responsible for the legislation mandates concerning joint planning, are administratively parallel to the State Boards for Vocational Education, most CETA dollars flow directly to local prime sponsors, which are responsible for planning for the use of those funds.

From the perspective of State planners in both systems, no simple administrative mechanisms exist for carrying out coordinated planning efforts. This is clearly one reason why the activity resulting from the 1976 amendments for joint planning has generally been in compliance with the law but has shown little evidence that reflects the real intent of the law. While the legislation intended that most of the effort for coordination would take place in the planning process, the law gives little insight into how this might be accomplished. The responsibility for assisting the States in implementing the coordination provisions was left to the Office of Education's Bureau of Occupational and Adult Education (BOAE).

Implementing the amendments. The OE regulations, as written by BOAE, are concerned with compliance with the law and they are essentially restatements of the provisions of the legislation. They do not indicate how the commentary by the SMSCs or the SACVEs might be used. As for the 5-year State vocational education plan, the regulations merely indicate to the State Boards the information the plans are to contain. For example, Section 104.188 of the regulations requires only that the mechanism for establishing coordination be described. It then adds a concern, not found in the legislation: "The description shall include the criteria developed to avoid duplication under this Act and CETA."

Attention to duplication of effort has been a concern since the original 1962 MDTA legislation. It is based on the assumption that similar programs are necessarily wasteful and it overlooks a basic

problem of any planned effort to serve a common population, such as the economically disadvantaged, that is not constant and that fluctuates in size. The match between programs and target group is difficult to effect. Moreover, the needs of this group, the common population to be served by both VEA and CETA programs, are many, and they go beyond economic concerns to include social and educational ones. It is quite plausible that in certain communities, duplicate programs may be necessary to reach those in need. A federally-funded VEA program in schools may be identical to one funded by CETA in a CBO, but the school program would deal with in-school youth and the CBO program with school drop-outs. A mix of service delivery and target population is complicated. It involves a variety of strategies that are ignored in the simplistic notion of "duplication of effort."

Apart from the monitoring activity produced by the regulations, the Bureau provided technical assistance to the States through its CETA Coordination Unit. But, despite all this, the planning requirements were slow to be implemented. An early review of selected State plans by BOAE observed:

Many State plans seem to have trouble differentiating between mechanisms for coordination, criteria for non-duplication, and results of coordination. A few State plans just repeat their mechanisms for both criteria and results. Some plans say that close cooperation will result in nonduplication of programs, but they list no criteria which explains how duplications are discovered.³¹

The Coordination process, as revealed in the State plans, has shown little progress since the 1976 amendments were implemented. Many States still refer to "manpower" programs, a phrase changed to "employment and training" by the Federal Government in 1978. Even in the 1979 and 1980 annual plans, mention of coordination is reduced to a few paragraphs that repeat the regulations with little thought on how resources from VEA and CETA might work together. One exception is the

State of Maine's 1979 annual report, which discusses the CETA set asides given to the Governor for vocational education. Most State plans, however, limit their discussion to the provisions of the VEA.

This suggests that the State plans represent a poor gauge for determining the States' efforts at coordination. In fiscal year 1978, the Governors received \$118.4 million from CETA for vocational education.³² Most of these funds or any activities derived from them would not appear in a plan required by the VEA.

Planning for coordination is predicated on a knowledge of resource availability and of how resources can be allocated in line with identified needs. On the State level, this planning is more difficult than developing the specifications for local programs because it not only requires the signoff of a variety of persons, but it demands information that is largely nonuniform or, worse, undetermined. The States' confusion as to how to plan for coordinating Federal resources, as specified in the law, could have been predicted. Not only was the task new, and therefore without precedent, but the systems to be coordinated were, in large measure, disparate.

SACVEs AND SMSCs. The evidence further suggests that the SACVEs viewed their mandate for review loosely. An examination of SACVE annual reports for fiscal year 1976, a year before the amendments were introduced, shows only nine SACVEs mentioned coordination with CETA.³³ By 1977, this number had increased by 22, and by 1978 was as high as forty-four. It is difficult to determine any trends from these reports since the level of coordination at these early stages were strictly exploratory. That this form of coordination was a new venture is clearly illustrated in a statement from a 1979 NACVE report, which noted that some general needs in this area were a clearer definition of roles of the education and employment and training systems, improved collaboration between the SACVEs and the SETCs at the planning stage, and more compatibility between information systems.³⁴

The NACVE did not stand alone in its recommendations. In 1977, a study for the National Commission for Manpower Policy concerning the State Manpower Services Councils showed that the role of vocational education in the SMSCs was only nominal: "Spokesman for this area [vocational education] reflected greater alienation from CETA than any other group."³⁵ The report concluded: "Specifically, we found both vocational education and the councils [SMSCs] uncertain as to their relationship.³⁶ This lack of clarity, at worst confusion, illustrates a basic principle of the CETA system, quite unlike that of the earlier MDTA relationship with vocational education. CETA--more specifically the prime sponsor system--contracts with a variety of organizations to provide services to meet the needs of its clients. Vocational education is only one of those services. This suggests that the coordination process may be much more cross-cutting or matrixlike in form than it was under MDTA.

As for the parallel mandate to the NACVE and the National Commission on Employment Policy for a joint statement on how consistent, integrated, and coordinated programs sponsored under the VEA and related acts were, this had not been fulfilled by early 1981. Had it been fulfilled, the mandate might have served as a catalyst for better joint planning by the States.

The newness, and therefore unprecedented nature, of the mandate suggests that any coordination between two organizations such as the SACVEs and the SETCs will at best be exploratory. Roles and functions need to be identified before resources can be allocated. The effort is complicated by the lack of definition in the legislation as to what a "consistent, integrated, and coordinated" approach for planning the use of resources means. The legislation and the regulations leave such interpretation to the States.

Part of the problem, especially with respect to the mandate given to the SACVEs to review and analyze State employment and training needs, may have been due to a misperception of Congressional intent. One survey notes that, rather than conduct a general review of the States activities in providing information, many SACVEs felt that their task required a detailed analysis of data and that this was better suited to the SOICCs. Once again, the lack of clarity in the 1976 amendments on the tasks of the various participants in the coordinated planning process hindered implementation of the legislation.³⁷

Ironically, Federal legislation, in subcontracting for program development, can not only provide additional resources for public vocational programs, but can also provide a counterbalance to public institutions for access to vocational education and training. For example, a student who does not succeed in a regular program may have the option of entering a program that is run by a public vocational institution partially funded by CETA, or of entering a separate program conducted by a CBO under CETA sponsorship. The CETA system is a remedial and compensatory option, and as such it provides additional access to vocational training. Ideally, the options for access are planned in a systematic, consistent, and sequential manner. This type of planning has not yet begun to appear in the State vocational education plans, although an awareness of the need for more responsible planning is becoming evident. As the SACVE in North Carolina has observed: "This Council believes that the time has come to move on the goals and recommendations of the Annual Report of the SETC from a reactive to a proactive mode."³⁸

A survey of only 50 prime sponsors conducted by the U.S. Conference of Mayors indicated that most prime sponsors felt that the full range of the areas involving vocational education were represented on their local councils and that "more than three out of five prime sponsors were involved with vocational educators in a variety of planning

mechanisms in addition to the Prime Sponsor Planning Council." The study further found that:

Over half of the prime sponsors believe that the elements of an effective, comprehensive CETA/vocational education planning system have been present in their planning efforts.³⁹

The study cited close working relationships and open channels of communication as the "keys to effective comprehensive planning."

A cautionary note must be raised regarding such optimism. If the vocational education community and the prime sponsors have identified the elements of a comprehensive planning system, then progress has been made. But like so much of the information on CETA and vocational education coordination, there is no evidence that the findings of this study are representative of the whole system. Until such evidence can be found, trends, much less typical behavior, cannot be assessed.

Developing Strategies for Coordination

The Reinforcing Effects of YEDPA

In 1977, the Congress passed P.L. 95-93, the Youth Employment and Demonstration Projects Act (YEDPA), as an amendment to Section 201, Title III, of DOL's 1973 CETA legislation. This law provided for a series of efforts designed to remedy high youth unemployment rates.⁴⁰

The legislation relied heavily on strategies involving educational programs and organizations to have "a significant long-term impact on the structural unemployment problems of youth...."⁴¹ Terms such as in-school youth, LEA, high school equivalency programs, vocational and postsecondary educational institutions, literacy training, and the like

are numerous in the legislation. References to vocational education are not. Except for requesting the assistance of the National Occupational Information Coordinating Council, the YEDPA legislation does not refer to the VEA, although the local youth advisory council, established under YEDPA, is required to have a representative from the local vocational education council in its membership.⁴²

It is difficult to define how YEDPA affected vocational education programs in public institutions. Much of this problem centered over the meaning assigned to vocational education by the employment and training community generally and by the U.S. Department of Labor specifically. The term is not defined precisely in the law; for record-keeping purposes, it can cover all occupational classroom training, wherever it is conducted, under the sponsorship of private or public institutions, agencies, and boards. Thus, the exact role played in YEDPA by the public vocational education enterprise is difficult to document. This is in contrast to the VEA's definition, found in Section 195, which defines vocational education as "organized educational programs which are directly related to the preparation of individuals for paid or unpaid employment, or for additional preparation for a career requiring other than a baccalaureate or advanced degree" Once again, the many facets of vocational education--as a curriculum, a program, and/or organization--created a problem in assessing its impact.

The Knowledge Development Plan. Despite the lack of clear evidence of YEDPA's effect on vocational education, it is not difficult to examine on the influence of YEDPA on education programs in general, and, by implication, vocational education in particular. A review of the Department of Labor's Knowledge Development Plan, an annual document that, although not legislatively mandated, served as a blueprint for organizing the various strategies and information to be collected from the YEDPA projects, shows that a variety of educational interest

groups and organizations received YEDPA funds. The Knowledge Development Plan represented a major Federal effort at involving numerous agencies and organizations, especially from the education and employment and training communities, in a common goal: developing a strategy for solving, or at least understanding, the issues in youth employment.

It should be noted that the process of formulating the Knowledge Development Plan paralleled in part the mandate given to the NACVE and the National Commission for Employment Policy in Section 162 of the VEA for comprehensive assessment of the Federal Government's employment and training needs. However, the Knowledge Development Plan was limited to Department of Labor funds and therefore considered only part of the Federal investment in employment and training. Moreover, it was formulated by employment and training economists who had a limited perspective on the variety of programs and kinds of organizations the plan involved.

The significance of the plan for the development of a coordinated Federal policy is that it attempted to enact and orchestrate a variety of actors, agencies, and organizations well beyond the normal constituency of the Department of Labor. In retrospect, this attempt at comprehensiveness may be one of YEDPA's most important contributions to the art of policy formulation.

The Knowledge Development Plan, with its emphasis on demonstration projects, special research studies, and program evaluation, employed a variety of techniques with education components. One particular strategy that illustrates a different way for advancing coordination between CETA monies and education programs (not legislatively mandated) is the use of third parties as catalysts for program development. A variety of groups whose support was perceived as necessary to implement the legislation were funded to provide technical assistance to their

constituencies. The resulting efforts, usually in the form of reports on exemplary or model programs, examined specific administrative concerns, not identified in the legislation but crucial for the development of local programs. In one case, the Louisiana Board of Elementary and Secondary Education was funded to prepare a progress report on coordination of CETA and vocational education in that State. The document served to increase contact between members of the various State education and employment and training agencies.⁴³ In Minnesota, the State's Youth Employment Education Unit developed a manual explaining how local schools and agencies might pool money from a variety of sources to develop coordinated programs.⁴⁴ Although the technical assistance efforts were largely information gathering, they created a process that increased the number of parties with knowledge of and participation in coordinating the activity.

Federal education agencies also participated in these efforts. The Department of Labor funded such agencies as the OE's Bureau of Occupational and Adult Education and The Fund for the Improvement of Postsecondary Education to develop programs involving CETA coordination with education, largely through a transfer of funds. Another transfer of DOL funds to an education agency resulted in the National Institute of Education's conducting an evaluation of the Career Intern Program being conducted by the Opportunities Industrialization Centers of America, a community-based organization. The NOICC also received considerable DOL support.

Beyond the technical assistance funds provided by DOL, such agencies as the BOAE and OE's Office of Career Education were spending their own monies to identify exemplary efforts and provide technical assistance to State and local agencies.⁴⁵ The National Institute of Education increased its funding for youth policy studies.⁴⁶ By the late 1970's, the topic of youth was a fashionable concern among Washington agencies, and as a result, a sizable informal network of

individuals representing various Federal programs was established. Youth issues further became a major social policy issue in President Carter's reelection campaign.

Defining roles and tasks. In large part, these activities were temporary in character. The efforts were designed to collect information on what was judged "to work." In fact, this became the common mode of presenting evidence on program coordination. Explanatory evidence, describing the modal or typical behavior of education organizations was never collected. Moreover, the costs and benefits to the government, as compared, for example, to similar CBO-run programs, was not examined in depth.

While these issues may seem crucial to the development of a Federal policy for coordinating resources across pieces of legislation, answers to such questions may be largely speculative. For example, there are currently 16,000 diversely organized local education agencies and approximately 500 prime sponsors, which are by design the center of decisionmaking in the CETA system. The sheer size of these numbers suggests that, under systematic inquiry, some basic patterns should emerge. The potential combinations and possibilities are enormous, but, without representative sampling, an analysis of the activity is not feasible. For these reasons, questions of effectiveness and efficiency to a large degree invite speculative answers. This suggests that any analysis of the YEDPA data as they might reflect coordination with public education organizations may be biased to the extent that evidence for analysis was collected through inquiries of demonstration efforts that worked well.

Coordinated efforts are often time consuming. Such efforts require meetings, gaining an operating knowledge of other organizations or of other legislation, and the like. It is reasonable to assume that YEDPA, despite the incentives to schools it offered, also contained

-disincentives, such as time consuming activities that yield inefficient costs. The extent to which this occurs may or may not be greater than the evidence reporting coordinated efforts. The Knowledge Development Plan only produced evidence on the extent to which coordination could occur. It was able to identify possibilities for encouraging coordination, but that clearly is very different from actually reporting level of coordination efforts.

Another way of viewing the impact of YEDPA is to observe that the Federal Government under YEDPA was beginning to identify a fundamental fact of bureaucratic life for the coordination of education and employment and training programs: the overlap among Federal, State, and local programs is a labyrinth of legislation, regulations, and policy. Although different laws may have similar goals, these laws may be administered in different ways by different agencies. What happened under YEDPA was strikingly similar--although with lesser Federal funding and therefore less intensity--to what happened with MDTA and vocational education coordination in the 1960's. The Federal Government became involved in mapping exercises designed to record the topography of the logistical systems--agencies, organizations, and the like--involved in the coordination effort. In the first stage, planning and implementing program coordination required a knowledge of unknown areas administered by agencies not familiar with each other's operating procedures. It was not unusual to find Federal officials or their contractors making site visits to local YEDPA programs to determine what efforts were being made and to collect information on those efforts for later dissemination. These efforts became common during the implementation of YEDPA.⁴⁷

Such mapping exercises may have had an indirect effect on the joint legislative planning requirements between CETA and vocational education, for YEDPA's intent closely reflected the goals of the 1976 Amendments for coordination. To the degree that this happened, YEDPA

'did affect vocational' education.'

Less direct support, though, is found in terms of the effect of YEDPA on the deliverers of public vocational education programs: the schools and postsecondary institutions.

The 22% set aside. The provision in YEDPA with the greatest potential for coordination with education appears in Section 343(d)(2), which requires that 22 percent of the funds available to prime sponsors under Section 343(a)(1) "shall be used for programs for in-school youth carried out pursuant to agreements between prime sponsor and local education agencies." In fiscal year 1980, the 22-percent set aside involved \$114 million dollars.⁴⁸ This particular strategy deserves further discussion because these agreements became a major topic in analyzing activities included for funding in the Knowledge Development Plan. This strategy is further defined by term, "in-school." The CETA legislation and accompanying regulations distinguishes among three different "in-school" classifications: in-school, "the status of being enrolled full time and attending an elementary, secondary, trade, technical or vocational school, a college, including a junior community or university...."; in-school programs, "a program which provides either or both career employment experience and transition services to in-school youth"; and in-school youth, "a person age 14-21 who is currently enrolled full-time in, and attending, a secondary, trade, technical, or vocational school or junior or community college or is scheduled to attend...or has not completed high school and is scheduled to attend...a program leading to a secondary school diploma or its equivalent."⁴⁹ These different definitions lead to very different means for assessing coordination strategies.

For the purposes of analysis, it is difficult to separate a program from a population served. Moreover, it is clear from the three definitions, that accounting accurately for the role of vocational

education in serving the needs of in-school youth is impossible using YEDPA data since the Department of Labor does not collect data that aggregate in-school youth by types of program that correspond to vocational education as defined by the VEA. Further, while the CETA legislation uses the Vocational Education Act's definition of a LEA, the law uses the Elementary and Secondary Education Act's definition of an LEA for the purposes of spending the 22-percent set aside. This, in effect, limits the role of community and junior colleges, although the CETA regulations do allow for LEAs to subcontract the set-aside funds with those institutions. This strategy of adopting different definitions was by design:)

Our thinking was that prime sponsors should be forced to at least sit down with public schools rather than avoiding them by going to the community college. We are not discouraging activities with these institutions and expect that with the other 78 percent of the funds these can be financed. But we certainly want to achieve public school-CETA linkage as a minimum.⁵⁰

The Utility of the Public Education System

The YEDPA strategy reviewed public schools as a fundamental element in the strategy for eliminating youth unemployment, but how well YEDPA succeeded in accomplishing the linkage between schools and prime sponsors under the set aside is questionable. The school systems only had to agree how the set-aside funds were to be spent. The monies did not go to the schools; they went to a population served by the schools. Therefore, in theory, the schools could agree that the set aside should be used to establish education programs in community based organizations, or, as was often the case in practice, to provide stipends for participants in programs. One report suggests that stipends became the major use of the set-aside funds.⁵¹

The monies targeted to in-school populations were used for a

variety of purposes by the prime sponsors. For example, in fiscal year 1979, a consortium of LEAs and the prime sponsor in Utah allocated 85 percent of their YEDPA monies to in-school youth, targeting on school dropouts and potential dropouts.⁵² In other places, programs were not run, but stipends were paid or counseling services provided with lesser percentages of the monies available.

The set aside created an awareness of a problem, youth unemployment, and of the role that an organization, the school, could play in attempting to solve this problem. It is unlikely that the set aside created permanent changes in the ways the schools operated.⁵³ The set asides were found to act as an incentive, but the effects were viewed as modest since many differences existed in the way prime sponsors and schools operated.⁵⁴ As under CETA, the problems observed in establishing YEDPA programs in schools were largely administrative. Reaching agreement between prime sponsors and school administrators on what academic credit should be given for work experience, scheduling, extending the school day, and delivery requirements for graduation became issues in the implementation of YEDPA programs.⁵⁵ These same concerns became prominent topics for the Federal Government's technical assistance effort in support of YEDPA.

In retrospect, the effects of the set aside should have been anticipated. Given the size of the public education enterprise and the discretionary nature of the limited YEDPA funds, the results would have to be mixed. Moreover, since one prime sponsor serves many school systems, funding patterns would be uneven. In fact, due to the language of the legislation, it is entirely believable that many LEAs that have in-school populations supported by YEDPA do not receive YEDPA funds.⁵⁶ Added to the differences among federally-established funding, planning, and operating schedules, were disincentives for collaboration among prime sponsors and LEAs that were present in the legislation.

Another difference outside the domain of law stems from the characteristics of the organizations urged to collaborate. Schools function largely as preventive mechanisms structured to serve a general population. Each year they process large numbers of individuals with the intent of providing them with certain skills for entering adult life.⁵⁷ While dropout rates in certain areas may argue the validity of this purpose, it is still how most Americans view the public education enterprise.

CETA programs function as remedial efforts for a specific target population, the economically disadvantaged. The task of the prime sponsors is largely qualitative, concerned with a selected population's achieving minimum standards.. Indeed, the YEDPA legislation suggests, or at least implies, that for some economically disadvantaged youth, the schools may not be the best providers of education and training. The search for alternative solutions for this population was one of YEDPA's goals.⁵⁸

This is not to suggest that the schools are not involved in remediation. Indeed, the major Federal involvement in education, the Elementary and Secondary Education Act, is compensatory in function--a fact recognized in the YEDPA definition of an LEA. The differences between the administration of ESEA and YEDPA monies stem from the involvement of different actors and different agencies. Moreover, ESEA funds are far less discretionary in utilization and more specific in purpose than YEDPA funds.

In the implementation of the ESEA legislation, the Federal government made a large investment in introducing compensatory programs into secondary schools and how to create changes in the way schools operate.⁵⁹ These findings are not reported in the various government documents describing YEDPA implementation. This suggests that the

grams that were developed by the employment and training community to utilize the resources of the schools in implementing YEDPA lacked knowledge of how schools operate. It also lends support to the notion that any party involved in the operation of programs should be asked to participate in program planning, be it the schools, vocational rehabilitation agencies, or other resources--a principle relevant to the CETA/VEA joint legislative mandates for coordination.

The Agreements Process

The CETA legislation is designed, according its Statement of Purpose:

- to provide for the maximum feasible coordination of plan, programs, and activities under this Act with economic development, community development, and related activities such as vocational education, vocational rehabilitation, public assistance, self employment training, and social service programs.⁶⁰

CETA prime sponsors are essentially the brokers of Federal funds. They receive monies to be spent on the needs of a specific population, and they distribute those monies to organizations that can provide the services to meet those needs. The agreement process is the administrative mechanism used to provide the necessary services. Agreements may be financial, as in the case of a contract with an LEA that provides stipends for in-school youth. Agreements also take other forms, such as memorandum of understanding or grants. Education agencies are only one of many kinds of organizations that prime sponsors write agreements with. For a variety of reasons, it may be more desirable to the CETA prime sponsor to chose a CBO or a private training facility over an LEA.

To simplify the accounting of funds, the Department of Labor's

management information system holds prime sponsors accountable for money spent on populations and programs, but not for the kinds of organizations that deliver those services. The number of agreements that prime sponsors enter into is not minor. In fiscal years 1975 and 1976, for example, the State of West Virginia entered into 536 funded contracts that enrolled 3,188 individuals in 'on-the-job training.⁶¹ The 1978 Michigan Employment and Training Service Council's Report to the Governor shows that 529 contracts and agreements were made by the State's 22 prime sponsors with various agencies, 199 of which were education agencies or institutions. And in a more recent study that examined CETA's relationship to vocational education, 50 prime sponsors reported the following counts of agreements with public vocational education agencies and institutions:⁶²

DISTRIBUTION OF AGREEMENTS AMONG 50 SELECTED PRIME SPONSORS WITH PUBLIC VOCATIONAL EDUCATION AGENCIES AND INSTITUTIONS

<u>Form of Agreement</u>	<u>Total Financial Agreements</u>	<u>Total Nonfinancial Agreements</u>
Contract	667	37
Grant	25	2
Memorandum of Understanding	140	226
Other	16	95
TOTAL	848	360

Source: U.S. Conference of Mayors. CETA/Vocational Education Coordination: A Status Report

Given the potential number of agencies apart from educational ones involved in CETA programs, the total number of agreements written must be well into the tens of thousands. It is difficult to answer questions regarding the benefits and costs of writing these agreements since information on them is not collected either by the Department of

Labor or its regional offices--knowledge of the agreements process can only be assessed by examining an individual prime sponsor's files. This raises a central problem for any planning activity that specifies coordinated program strategies regarding the fit between kinds of needs to be met and agencies used to meet those needs. Does a functional relationship exist?⁶³ Evidence on this point is extremely limited, but unlike the early years of CETA, when most prime sponsor decision-making was significantly shaped by day-to-day political considerations,⁶⁴ later evidence from a study of Ohio prime sponsors found that the choice of the service deliverers was being determined by the client population served.⁶⁵

The notion of whether a functional relationship found to be reliable or patterned exists has obvious implications for the development of Federal policy. This connection, though, is more complex than matching individuals with organizations. For example, it has been argued that one of the best insurances against youth unemployment is having youth remain in school. In terms of what works best for whom, it is further argued that vocational education appears to have promise only when it is highly likely that the student will have access to job opportunities upon completion of the program.⁶⁶ While this may seem so obvious that it hardly deserves mention, it does suggest a central problem in any comprehensive planning strategy that depends on coordinated efforts: what are the bounds or limits to be placed on the effort being planned? For example, if vocational education is most promising when jobs are available, to what extent should coordination between vocational education and CETA programs include job placement?

The question is not academic for some contracts between a prime sponsor and a school for a vocational training program require that the school place a certain percentage of students in the program in jobs. In fact, a separate body of literature exists on this issue, which is frequently referred to as the "school-to-work transition."⁶⁷ It is

based on the perception that some patterned behavior or logical and ordered activity takes place when an individual leaves school and seeks employment. It further assumes that a series of linkages among organizations can be created to facilitate this process. The YEDPA Knowledge Development Plan outlined and explored what these strategies might be and reported some very tentative findings; for example, "the highly linked projects appear to be those more oriented to intermediating between youth and the labor market, while the less linked projects are those focusing on human resource development to prepare ~~youth~~ to better compete in the labor market."⁶⁸ The evidence suggests that the level of linkage a project has can have an impact on the outcomes for individuals enrolled in the program. This raises a variety of questions that affect planning. How comprehensive a project is and how many linkages among different kinds of agencies are developed depend on the aims for the project and thus, on the planning process. By implication, coordinated activity can be viewed as functional in nature. The character and shape that these linkages would take is still intuitive and conjectural, although a reanalysis of the data collected under YEDPA that is currently underway may provide some definitive information on the kind of linkages to foster by agreements.⁶⁹ Limitations on the effectiveness of the deployment and the resulting efficiency of agreements exists and needs to be recognized. Coordination may not be the universal means for developing a solution to youth unemployment. The Federal Government has yet to extend its efforts in promoting coordination to examine these issues.

Reauthorizing CETA in 1978

Refining the Relationship

In 1978, Congress reauthorized the CETA legislation.⁷⁰ In this legislation, the Governors' set aside for vocational education was increased to 6 percent, greater involvement of the private sector in

CETA programs was promoted, and YEDPA was left unchanged. The varieties of and references to educational programs and organizations were more numerous in the 1978 Amendments than in previous legislation. The 1976 amendments were left intact, although the Congress replaced the word "manpower" with the phrase "employment and training." Further, the Congress attempted to clarify the legislation by rearranging titles. These latter two actions made any comparison of CETA with vocational education programs before and after 1978 a much more exacting procedure since the information no longer shared a common base for identification. But the major changes to CETA were outside the realm of coordination, involving tightening eligibility requirements and monitoring systems. Public service employment was coupled with training programs. This had a direct effect on education since many public service employees were assigned to schools, and an indirect effect on vocational education since the schools often contracted to train these employees.

At the time of reauthorization, joint CETA/VEA representation on State planning committees had become common. It appears that specific roles of each committee were being defined. There is no evidence though that these efforts went beyond the acknowledgment of each other's plan. The main effort seemed to be the exchange of information between the two Councils.⁷¹ Problems in coordination planning existed, and some were directly attributed to the Federal legislation: the differences between vocational education and CETA in planning and funding cycles for any fiscal year.⁷² It appears that the funds available to the States under CETA reinforced the joint CETA/VEA planning efforts since the same agencies who planned were involved in the distribution of dollars. Numerous States prepared reports, for example the Pennsylvania Department of Labor and Industry funded the State's Department of Education to conduct a survey on how to improve education and CETA linkages within the State.⁷³ State vocational education departments not only participated in the 6-percent funds, but

also in the other funds made available under CETA to the Governors such as the Governor's 1-percent funds to promote linkage among State agencies and the special 4-percent funds for coordination according to the 12 special activities mentioned in Section 105 of the CETA legislation.⁷⁴

Characteristically, the monies were spent in many ways. Such diversity is common in the use of the Governors' CETA funds. Yet, reviews indicate some differentiation across the three categories of funds. For example, the 1-percent monies frequently are not received by State vocational education agencies, but when they are, they are often used to reduce administrative barriers. These funds might be used, for example, to resolve scheduling differences by creating open entry and exit training programs in vocational education or to establishing regional State placement officers in education institutions. The flexibility of these funds is shown by the one State that used the 1 percent monies to pay for the staff of a research project on coordination that was funded by the 4-percent monies. The 4-percent monies are also found to support programs on research and development, such as grants to SOICCs, rather than for direct coordination activity.⁷⁵ The 6-percent monies were required by law to be used for vocational education. The Federal administrative procedure for these monies, established in the 1973 Act, did not change in the 1978 amendments. The administration of these dollars on the State level showed a great variance, with some State vocational education agencies reporting as many as 10 staff persons dealing with CETA coordination.⁷⁶ The discretionary use of these funds is exemplified by one State that contains a single CETA prime sponsor. That State's vocational education agency established a three member staff to administer the 6-percent monies. The same staff also administers the YEDPA 22-percent set aside. Moreover, in this particular State, the prime sponsor combines the 6-percent funds, the 22-percent set aside for CETA clients, and VEA dollars to run a skills center. Such combinations are hardly unique.

The legislatively mandated agreements between State-level CETA and vocational education agencies were not always the smoothest mechanism for spending the 6-percent monies. Constraints such as the differences in funding and planning cycles, as well as the unpredictability of the amount of 6-percent monies, created obvious difficulties. More subtle, but equally detrimental, were the different operating styles of the agencies responsible for the administration of the funds and their perceptions of how the monies were to be spent. Some of these differences and imperceptions stemmed from the late 1960's, when the community action agencies, later replaced by prime sponsors under CETA, viewed granting monies to more traditional administrative units such as State vocational education agencies a political concession. Other differences were caused by disputes over the purpose of the funds: to promote communication and coordination or to pay for stipends, or could they be better spent by directly funding prime sponsors to purchase vocational education services from schools? In some States such problems resulted in difficulties in writing agreements, and consequently, funds had to be carried over from one year to the next.⁷⁷ Such difficulties, in large measure, stemmed from CETA, a Federal experiment in the flexibility of program administration which was accompanied by a lack of direction from the Federal government as to what was permitted by that flexibility.

Still, by the 1978 reauthorization of CETA, more communication between the education and CETA systems was taking place than at any time in the 20 year history of Congressionally-encouraged coordination. The efforts went far beyond the 1976 amendments to the Vocational Education Act, which were perhaps the least incentives for coordination, since the potential for additional Federal money for funding vocational education programs was inspired by the CETA legislation's discretionary ability to make financial contracts.

The Flow of Funds

One of the basic questions in the analysis of a Federal program--for what are the dollars used--in this case cannot be answered. The flow of dollars between CETA prime sponsors and vocational education programs cannot be calculated on this level of analysis. Such accounting would require aggregating dollars across a series of information bases that use inconsistent definitions of populations, organizational affiliations, and programs. (The two CETA definitions of a local education agency clearly illustrate this.). These definitions are designed to assess the goal structure of the legislation, which differs from issues of program coordination. Coordination is merely a means for accomplishing goals. As presented in the legislation, coordination is largely a symbolic mechanism since its enforcement and assessment were not addressed by the Congress. Moreover, the statutes clearly speak to a coordination of nonfinancial resources such as staff capabilities, curriculum development facilities, and planning strategies--surrogates for Federal dollars. Except for discretionary dollars, no VEA funds are involved in coordinated activity. Only the CETA legislation makes funds available for programmatic purposes. In the case of the Governor's set aside, these are the only dollars in CETA specifically for vocational education. In fact, at no other point in the entire CETA legislation is an education program or organization mandated to become the recipient of CETA funds. Any other funds for vocational education or education in general are given at the discretion of the Governor or, as is more typically the case, the prime sponsor. This follows from the basic strategy of the legislation, which is to permit local authorities to manage programs and select service deliveries, including vocational education.

For an analysis of program coordination, it is perhaps more appropriate to examine the ways in which coordination takes place rather than to focus on the amount of dollars. Within certain constraints,

the flow of dollars from CETA to education programs can be crudely estimated. However, judging the involvement of individual prime sponsors in any such transfer is purely speculative, providing such information since records are maintained only on the local level. This is a real problem since most of the flow of funds to education occurs locally.

One of the best means for examining the flow of funds is to look at those titles of CETA which allow for financial transfers. While this method indicates the legislative provisions that lead to coordination through the transfer of funds, it does not identify how the funds are used. Another drawback to this approach is the previously cited definitional differences within the CETA system. Another is that the necessary information must be compiled from a variety of sources, prior to and after, the 1978 reauthorization. Cumulative estimates are, therefore, not feasible.

Title II of the CETA legislation (Title I of the original 1973 Act) deals with comprehensive employment and training programs. This is the largest title of the CETA legislation which in fiscal year 1980 had a budget authority of \$2.054 billion.⁷⁸ This same title contains the Governor's set aside for vocational education. A recent analysis by the Department of Labor shows that from fiscal year 1973 to fiscal year 1978, when the Governor's set aside was still at the 5-percent level, a total of \$350.3 millions was distributed. In fiscal year 1978 alone, the set aside amounted to \$111.4 million.⁷⁹ Another way to examine this sum is that it represents only 6.3% of the funds in fiscal year 1978 available under this title for classroom training.

However, classroom training as defined by the Department of Labor is not synonymous with public school education programs. Rather, it is "any training" of the type normally conducted in an institutional setting, including vocational education, that is designed to provide individuals with the technical skills and information required to perform a

specific job or groups of jobs.⁸⁰ In fiscal year 1978, prime sponsors received \$754.3 million for classroom training. These monies were distributed, primarily through prime sponsor contracts, to the variety of institutions conducting classroom training. Thus, although the potential involvement of the schools was large, the actual involvement cannot be estimated.

Public school education can also receive funds under Title III of CETA, which provides training services for special populations such as Indians, migrants, and older workers. Although it has been documented that schools are used to provide the training services,⁸¹ estimates of the amounts given to the schools cannot be derived because the Title III funds are not allocated according to the kinds of organizations that conduct the training.

Title IV of the CETA legislation encompasses the YEDPA youth programs. The only education set aside is for in-school youth, but once again, prime sponsors can choose to devote more funds for education functions. The budget authority for YEDPA was \$826 million in fiscal year 1980.⁸² This sum does not include the Job Corps or the Youth Conservation Corps, other CETA programs that include youth in enrollments.

Public service employment is found in two sections of the CETA legislation. Title VI, counter-cyclical public service employment, in fiscal year 1979 consisted of 3.3 billion dollars; Title II-D, transitional employment opportunities for the economically disadvantaged, in fiscal year 1979 accounted for \$1.8 billion dollars. Public service employment, commonly termed PSE, in fiscal year 1979 became the largest CETA program accounting for 54 percent of CETA outlays. Prime sponsors would frequently assign public service employees to public schools or other agencies. The schools would use the employees for general maintenance tasks and for tasks such as transportation and library

aides. In some cases, the schools would provide training for these employees. When CETA was reauthorized, the term "in-school" was added to the eligibility requirements so public service employment funds could be mixed with Title II monies to provide more work study programs.⁸³ One estimate for fiscal year 1979 indicates that \$480 million was being transferred to public education institutions for public service employment from Titles II-D and IV.⁸⁴ Although this is a large sum, its impact on education may be misleading. While the money went into LEAs, it did not necessarily go to vocational education programs. Moreover, most of the funds were used for support or maintenance; only 6 percent of the PSE employees in public education institutions were involved in teaching-related activities.⁸⁵

None of the CETA funding is permanent. The funding fluctuates each year according to Congressionally-imposed funding levels and the contracting decisions of the various prime sponsors. This has generated a great deal of interest on the part of the education constituencies affected. Reports produced by these groups are in large measure biased by the perspectives of the various groups conducting the studies. In 1978, the Wisconsin State Research Coordinating Unit, a State organization mandated by the VEA, asked the State and territorial directors of vocational education to report the amount of CETA dollars administered or expected to be administered by their State departments of vocational education during the fiscal year 1978. The 54 directors that responded indicated that \$152 million of CETA funds were administered or used by the State directors for vocational education programs. The largest proportion was obviously the Governor's 5-percent set aside for vocational education. When these same persons were asked to estimate the amount of CETA funds received by LEAs directly from prime sponsors, the 23 directors who responded reported an amount of almost \$210.6 million.⁸⁶ None of this money was mandated by legislation. What is most striking about this figure is that it underreports CETA funds used by public education organizations. Clearly, by even the most

conservative estimates, the flow of CEJA dollars into educational institutions and programs is very large.

The Omnibus Reconciliation Act of 1981, as detailed in the Conference Report, suggests that changes may occur in these funding patterns. That bill removes the separate categories for the Governor's grants and reduces the total sum for their use from 12 to 10.5 percent. This means that State vocational education agencies will be in potential competition for reduced funding with other State agencies, including in SETCs, whose funds are also controlled by the Governor. The same bill eliminates public service employment from CETA and deletes the maintenance of effort for youth clause under Title II. This could affect the flow of funds for youth and, by implication, the funds for LEAs. Furthermore, these changes are concerned with authorization for appropriation, not the Congress's appropriation level. The authorization bill allows approximately \$3.8 billion for training purposes under CETA.

The Consequences of Coordinating Solutions.

Pooling Resources As a Coordination Strategy

Coordination between education and employment and training programs is difficult to achieve because the systems to be coordinated are diverse, fragmented, and complex. In a broad sense, coordination implies an alignment or association. Within education, coordination has become a term commonly, if not too readily, used as a synonym for such associations (also referred to as linkage, coupling, or articulation). Too often, the idea of coordination has an implicit value attached to it. Much coordination is seen as positive. Its lack is viewed as negative. Moreover, it is often perceived as a joint process, prime sponsors and LEAs acting in unison. This ignores the fact that delegating authority or responsibility for a task--a principal inherent in much of the legislation--can be a more efficient mechanism than a united

effort. This perspective also ignores my questions that consider the costs and the benefits of coordination strategies.

Except for specifying certain planning requirements, the Congress is purely suggestive in terms of coordination mandates between the VEA and CETA. One way to avoid misreading the legislation is to view coordination as an association formed to pool resources in order to accomplish certain tasks related to that association. This definition is derived directly from how coordination is used, under both laws, which involves the application of resources to areas and individuals in need of those resources. Inherent in this definition is the problem of flexibility. Since the resources do exist, the issue becomes how easily they can be combined and coordinated. Historically, coordination efforts have focused on questions of flexibility that are largely administrative concerns.

This perspective is particularly useful for understanding how Federal programs operate on the local level. The concern on all levels of government is how to fit Federal programs with other applicable State and local resources to meet local needs--an approach that reverses the Federal perspective. For example, Federal vocational education and CETA monies are often used with other monies to develop programs. In Modesto, California, the city schools entered into an agreement with the county CETA prime sponsor and the California Department of Rehabilitation to establish and maintain a career vocational evaluation center designed to assess handicapped pupils' employability skills.⁸⁷

Federal vocational education and CETA-dollars have also been used by schools to develop programs that combine resources from community development block grant monies, Title XX of the Social Security Act, ESEA funds, and various State, local, and private funds. The Economic Development Administration and the various regional commissions may al-

so provide revenues to develop programs.⁸⁸ Moreover, these combined funds may be targeted on a variety of individuals and operated, according to one account, by no less than 12 different kinds of education agencies that deal with vocational education.⁸⁹ In Hartford, Connecticut, the school system created an alternative vocational program that involves 11 different funding sources.⁹⁰ Such ingenuity requires the ability to pool monies with differing application, reporting, and fiscal cycles. In theory, the pooling of funds is feasible. In practice, those same funds may not have the administrative flexibility necessary for the efficient operation of a program.

The flexibility of financial resources varies according to the recipient of the funds, the purposes for which they are to be spent, and the amount available. The process is complicated by the intervention of State and local laws,⁹¹ and the constraints in the operation of grants-in-aid programs by the Constitution and the courts.⁹² For example, many target populations are eligible to receive funds under more than one Federal statute. This is the case for those economically disadvantaged individuals who fit both the Vocational Education Act and CETA's different definitions of economically disadvantaged.⁹³ This is even greater for handicapped individuals who are or are not eligible for funds depending upon whether the Education for All Handicapped Children Act, the Vocational Rehabilitation Act, or the Vocational Education Act definition of a handicapped individual is used. Even when there is a fit across definitions, a problem can occur because different sources of funds are to be used for different purposes. The need to fit together the purposes of legislation is shown, for example, under the CETA Title VI public service job monies, which may be matched by vocational education monies and other CETA dollars to provide training programs for school employees. Pooling funds effectively requires that this be done efficiently, and some funds may not be worth the effort. For example, VEA dollars for economically disadvantaged persons are distributed to the States and then to LEAs. These funds require a

50 percent match at the State or local level. Moreover, the Federal VEA funds can only be used to pay for the excess cost above the regular cost of maintaining an individual in a program. CETA dollars, on the other hand, go directly to local prime sponsors who distribute the monies to contractors for programs where no matching dollars are required.

Following enactment of the Education Amendments of 1976, organizations on different levels of government prepared a series of documents that act as a guide for pooling monies and resources to develop local programs. These documents are remarkably varied not only in topic but also in terms of who developed them. For example, OVAE's program on corrections education has prepared a resource guide to over 50 Federal programs that can be used to develop education programs in correctional institutions. The guide further enumerates how to apply for these programs.⁹⁴ The Women's Bureau at the Department of Labor produced a guide to CETA that is frequently used by education organizations in developing CETA programs for women.⁹⁵ The California State Advisory Council on Vocational Education prepared a guide for developing comprehensive vocational services. This guide lists some 60 Federal programs that can be linked into a comprehensive delivery system on the local level, and using a matrix format, discusses relationships among expenditures categories.⁹⁶ The format is very similar to one developed by the Minnesota Manpower Council to implement YEDPA programs.⁹⁷

Although this is not an exhaustive list, the diversity of these few documents suggests that the various organizations and agencies involved in developing coordinated programs are having similar problems. Any coordinated activity assumes that a natural relationship exists between the phenomena being coordinated. Since so many of the observed efforts are not prescribed by the legislation, this assumption seems to hold. How well the statutes are able to build on those natural pat-

terns is a different kind of question.

The preface for this paper argues that many of the difficulties encountered in administering a legislative solution to a social problem are inherent in the design of the solution. And by corollary, those solutions that succeed do so only to the extent to which they consider the behaviors of the affected parties; be they people, organizations, or jurisdictions. It would seem logical that when coordination is desired, the effective legislation would consider mutual behavior.

In the case of CETA and vocational education, there is little acknowledging of the status of the relationship between the two systems. Curiously, the least coordinated activity observed is around those legislative mandates that are jointly prescriptive--planning efforts and the development of "a consistent, integrated, and coordinated approach" to meeting the "employment and training needs of the nation." Yet this mandate is probably the most strategic of all attempts to pool resources since it raises a series of questions centering on the effectiveness and efficiency of such an effort. Legislation can have incentives, but it can also have unintended sanctions. How a law specifies an administrative solution to a social problem will affect the remedy. Coordinated activity may be facilitated more by the manner in which it is perceived than in by feasibility of the effort.

Administering Solutions

There are some 500 Federal grant-in-aid programs.⁹⁸ Some programs may have cross-cutting purposes. At the same time, they may have contradictory ones. In the case of human resources policies, programs are often developed in piecemeal fashion, "a by-product or consequence of policy formation in other areas."⁹⁹ The consequences of such programs determines the types of coordination that may occur. These consequences can stem from a variety of factors but, in large measure,

result from the generic structure of the Federal legislation.

This paper has looked at two grant-in-aid programs as if both had similar structures. This is not entirely correct. CETA is really a hybrid block grant program, first formulated from a cluster of categorical programs that have, in time, come increasingly under Federal control and have thus become more categorical.¹⁰⁰ One consequence of this change has been a tendency by the vocational education community to view CETA monies as MDTA monies -- as an entitlement rather than as a written agreement with contractual characteristics. Perceptions of how programs should operate can lag behind legislative changes. In this case, the institutional memory is almost 20 years.

A similar evolutionary history is found in another human resources program, the Community Development Block Grant. This program, like CETA, is a Federal-local program having local decentralization of decisionmaking as a programmatic goal. But again, with the passage of time, the Federal role has become more extensive.¹⁰¹ There is evidence not only to support the fact that block grants have essential features, but to suggest that those features can be differentiated by the type of block grant.¹⁰² This implies that a series of arrangements (or fits) could exist to facilitate the implementation of strategies to support a common Federal goal.

In theory, block grants are polar to categorical programs. Under block grants, the funds have maximum flexibility in the use of those resources but then goals may be more difficult to achieve. This suggests that if the Federal government is to view program coordination in strategic terms, then by definition, certain categorical properties may emerge that hamper flexibility. Likewise, whatever the problem that coordination is to address, such as youth unemployment, may be so broad as to complicate the number and kinds of programs that need to be coordinated to cope with the problem.¹⁰³ The question that arises is

whether a coordinated Federal program strategy is feasible. An answer requires a brief review of other efforts that involve the coordination of Federal programs.

Coordination among Federal human resources programs is not new. The organizational histories of most agencies show at least some contact with other programs having overlapping goals or target groups to be served. The vocational rehabilitation agency, for example, established a formal written agreement with the Veteran's Administration in 1946, and, in 1967, made a formal link with the Office of Education's special education and vocational education to coordinate programs. The idea, usually associated with coordination, is that it is a good to have, but the goodness may be more symbolic than practiced.¹⁰⁴ The question of feasibility becomes an issue not so much with the idea of coordination, but with its implementation, especially when a comprehensive perspective on a problem is maintained.

Many of the difficulties experienced in coordinating CETA and vocational education programs are analogous to the problems that the Federal Government encountered in administering the Model Cities Program in the late 1960's. That program attempted to improve urban areas by designating certain target communities as models through the Demonstration Cities and Metropolitan Development Act of 1966 and coordinating other Federal programs that aided urban areas with the goals of the Model Cities legislation. The strategies developed were contingent on comprehensive planning and comprehensive funding, both of which ran into obstacles when an attempt was made to put these processes into operation.¹⁰⁵ Different agencies had different operating procedures and operated under different legislative and legal requirements. The problems for planning and funding were caused by the same structural hindrances that create obstacles for CETA-vocational education coordination. Under the Model Cities effort, the comprehensive approach was found to have utility on the local level. There coordination

required a political strategy for resolving the diverse aims of the various units of local government and other groups serving different constituencies. Adopting a comprehensive perspective required that all needs be considered in some rational or planned manner. The proliferation of programs that resulted from the planned use of comprehensive funding appeased opposing constituencies and created a political mediating force and permitted the goals of the Model Cities Program to be put into place.¹⁰⁶

Coordination efforts involving many bureaucracies require a mandate with some central authority that has the breadth of perspective necessary to discern all the factors involved in coordination. Like the CETA-vocational education effort, the Model Cities program suffered from the authority's being invested in one of the units being coordinated (the Department of Housing and Urban Development). This restriction is clearly a hindrance to the goals of the effort.

Coming Full Circle

The coordination of Federal vocational education programs with Federal employment and training programs came full circle with the proposed Youth Act of 1980.¹⁰⁷ This legislation, which was never passed by the 95th Congress, echoed the original MDTA legislation by creating separate titles for education and employment and training programs. The first title, an extension and revision of Title IV of CETA, followed the comprehensive perspective of the CETA legislation by stating "the purpose of this title is to...promote a partnership and linkage among education and training programs for the disadvantaged." The 22-percent set aside for in-school youth was retained.

Title II provided assistance to school and school-aged populations. It was unique in the history of coordination legislation for several reasons. It was developed in direct consultation with educa-

tors, something that had not happened to a great extent under earlier versions of CETA. The approach chosen was modeled after the experience gained in the introduction of the ESEA legislation on how to target Federal in-school programs to serve disadvantaged youth. This, as mentioned earlier, utilized a knowledge base lacking in the development of the youth initiative at DOL.

The uniqueness of Title II is further displayed by its structure. The legislation first lists findings on the role of schools in serving the basic and employment skills of secondary school youth, and then gives the purpose of the legislation--providing financial assistance to support that role. Direct authority and purpose are established at the authorizing level of implementation. The Congress further recognized the different roles of various sections of the education community and targeted 25 percent of the Title II funds for vocational education in schools. As specified in the act, the actual administration of those dollars appears cumbersome. Local schools seeking to use these monies would first seek approval for their plans from the State Board of Vocational Education. As in State vocational education plans, approval from outside parties would also be required. As such, the administration of the Federal dollars was far from being administratively clear. Once again, the efforts of putting a program together could outweigh the costs of running it.

As the history of coordinated efforts has shown, clarity of legislative intent and formal authority for implementation do not necessarily lead to collaboration, especially if these two processes are overly prescriptive in detailing administrative procedures. Both public vocational education and CETA delivery systems are diffuse and decentralized enterprises. Decisions that make sense at the Federal level can have quite the opposite effect on the local level. For example, it may seem logical to Federal officials that a total sum should be obtainable indicating the flow of dollars from prime sponsors to local education

agencies. Yet an operating knowledge of how local agreements are written indicates the obvious error in that belief. Coordination, if it is to work, must be conceived in broad, seemingly ambiguous terms that are more than symbolic. The pooling of resources can be facilitated only if the definitions of target population, planning and budget cycles, and other structural determinants of operating a program that have, like a series of intersecting circles, a common overlap that acts as an efficient catalyst in formulating the effort. This has not, historically, been the case. Under the implementation of MDTA, CETA, and YEDPA, a massive effort went into identifying the various resources and roles of the participants to establish coordinated efforts.

Planning the use of resources represents the ideal or rational activity, but the operation of programs is redefined by the actors who use those resources. Coordinated planning requires a knowledge of the strengths and weaknesses of a variety of organizations, programs, and the like for meeting the diversity of individual needs for education and training skills. To date, that knowledge base has been lacking. Only with it can strategies be discerned for intelligent planning efforts. This suggests why the 1976 amendments were not more productive in fostering coordination, but why the resources for establishing programs offered by CETA and YEDPA did produce results.

Making Coordination Feasible

The coordination of Federal education and employment and training programs has been perceived in many different ways over the past 20 years because the social problems that these programs are designed to solve are much broader than a combination of the programs. Ironically, adopting a more comprehensive perspective only complicates the administrative solution. It is perhaps much more realistic to begin planning with the knowledge that the perception of the problem will dictate the administration of the solution. If the Congress hears testimony that

schools and prime sponsors are not working together and that this contributes to high youth unemployment in urban areas, any resulting legislation likely will require that the two systems work closer together. On the other hand, Governors or other State officials may argue that States can best allocate resources among various groups responsible for meeting training needs and therefore the resources should be allocated to the States. The solution, often one of political compromise, may attempt a remedy but in doing so it may ignore key structural problems for coordinating programs.

Coordination between two programs implies that certain commonalities, points of equal definition, exist. This principle becomes more important when coordination among three or more programs is required to achieve a desired outcome. From the perspective of operating Federal programs, common grounds are merely uniform administrative procedures.

For example, a local school system may wish to establish an education and training program for a group of handicapped students. While the resources for such a program may exist on the local and State levels, it is more probable that they come from several Federal programs. Piecing together an operating program from various resources requires not only a knowledge of what is available, but of how to reconcile different funding cycles, regulations, reporting requirements, and the like. Resources are pooled within the limits of a local district's expertise at handling the Federal bureaucracy. That Federal programs have differing aims is not the problem. Diverse goals are necessary to meet the broad range of individual needs for education and training for employment. But even similar goals require some direction if they are to be implemented. At the same time, too much direction hampers their flexibility and places limits on those who can be served.

Coordination may not be the answer. Because it is perceived as being good does not mean that it is effective and efficient. In areas

where the needs for training are similar and in large demand, it may be easier, that is to say more efficient, to have resources vested in one authority. If the problem to be solved is complex or if it must meet diverse individual needs, separate solutions may be more effective. In the former case, program coordination may not make sense. In the latter, it may be the only answer. The problem becomes how to identify, from a national perspective, those common points among systems that clarify authority to accomplish specific ends without hampering the need to meet dissimilar goals. In terms of linking CETA and vocational education programs, the problem translates into: "Who is responsible for what?" Congress answered this in the early MDTA legislation, and the Carter Administration dealt with it in the proposed Youth Act of 1980. It was left unattended in the Education Amendments of 1976.

CETA and vocational education are only two of a variety of programs that are loosely related under the term "human resources." While all of these programs affect the development of individual potential, the rationales for their development often differ. By not considering this fact, the Federal Government has produced a variety of strategies without having developed a systematic human resources policy. Therefore, the promotion of CETA and vocational education coordination can create confusion in the operation of other policies, especially when lines of authority are not clearly drawn. A classic example of this involves making a decision about the eligibility of a student, identified as learning disabled under the Education of the Handicapped Act, for a program sponsored under the special program for the disadvantaged provisions of the VEA with stipends paid for by CETA. Is this possible under current Federal law? Is it feasible within the bounds of a local education agency?

Despite their differences, the CETA and vocational education programs have many common characteristics, and they probably would have more if the laws would clarify their roles in preparing individuals for

employment. If coordination is perceived as a valid Federal role then resolving problems related to coordination is one of the most crucial issues to be considered in the impending reauthorization of these laws. Whether or not coordination will lead to a solution to the social problems that these programs are designed to resolve, especially when they are formulated apart from related Federal policies, remains a more difficult and perhaps spurious question.

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2. P.L. 87-415, Sec. 302.
3. In a further example of the clarity and specific direction of the early legislation, the 1963 amendments to the MDTA, P.L. 88-214, Section 203, noted that the Secretary of Labor was to only consider training allowance monies for individuals who had not completed high school or for whom it was concluded that they would not be aided by work study programs sponsored by Section 13 of the 1963 VEA.
4. For a more detailed discussion of these types of training, see Garth L. Mangum and John Walsh, A Decade of Manpower Development and Training (Salt Lake City, Utah: Olympus Publishing Company, 1973).
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8. The Comprehensive Employment and Training Act of 1973, P.L. 93-203.
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45. See Sally M. Brower, Elizabeth H. Oglesby, and Carol S. Whitney, Case Studies of Vocational Education -- CETA Coordination: A State of the Art Report (Raleigh, N.C.; Conserva, Inc., January 1980).
46. See, Funding Opportunities at NIE for fiscal years 1979 and 1980; also, the various publications of the Vice President's Task Force on Youth, in particular, "Workplaces and Classrooms: A Partnership for the '80s", unpublished conference proceedings, Baltimore, Maryland", September 26-27, 1979.
47. Coordination and Linkages for Service Delivery: CETA Staff Evaluation, Report No. 5 (Washington, D.C.: Office of Manpower Program Evaluation, Office of Policy Evaluation and Review, Employment and Training Administration, U.S. Department of Labor, October 1975).

48. William H. Wilken and Lawrence L. Brown, III, Manpower - Education Coordination: Two Decades of Frustration Technical Analysis Report No. 4 (Washington, D.C.: Office of Technical and Analytic Systems, Office of Planning and Budget, U.S. Department of Education, January 1981), p. 13.
49. Employment and Training Administration (ETA) Glossary of Program Terms and Definitions, 2nd Edition (Washington, D.C.: Employment and Training Administration, U.S. Department of Labor, 1979), p. 82.
50. Report on Joint DHEW/DOL Youth Employment and Demonstrations Projects Act Workshops (Washington, D.C.: Office of Youth Programs, Employment and Training Administration, U.S. Department of Labor, undated document), p. 34.
51. Wilken and Brown, op. cit., p. 29.
52. Robert J. Ivry and Alan Weisberg, "The 22% Solution: LEA/CETA Collaboration on Youth Employment and Training Programs," Unpublished draft (Washington, D.C.: Office of Career Education/U.S. Department of Education, August 1980), p. 17.
53. The story on the actual cooperation between the schools and CETA prime sponsors is mixed. Some report that the relationship is best characterized by distrust. (Richard F. Elmore, "The Youth Unemployment Delivery System" in A Review of Youth Employment Problems, Programs and Policies, Vol. 3 Washington, D.C.: Vice President's Task Force on Youth Employment, 1980), p. 10. Others argue that the 22% set aside has "gone a long way toward accomplishing its purpose, an occurrence which is all too infrequent in Federal social programs." (Ivry and Weisberg, op. cit.) Given the fact that prime sponsors form agreements with many different kinds of organizations, it may be worth noting the relative ease with which agreements with LEAs are formed as opposed to those formed with labor unions and the business community. (Sam Andrew, Paul Harrington, and Glen Schneider, CETA Prime Sponsor Self-Review, Youth Knowledge Development Report 3.20 (Washington, D.C.: Office of Youth Programs, Employment and Training Administration, U.S. Department of Labor, May 1980.)
54. Gregory Wurzburg, Youth and the Local Employment Agenda: An Analysis of Prime Sponsor Experience Implementing the Youth Employment and Demonstration Projects Act (Washington, D.C.: National Council on Employment Policy, January 1980), p. 3.

55. Impact of YEDPA on Education/CETA Relationships at the Local Level: Five Case Studies, Office of Youth Programs Special Report No. 1 (Washington, D.C.: Office of Youth Programs, Employment and Training Administration, Department of Labor, August 1978), p. 4.
56. A staff member from a balance-of-State prime sponsor once noted at a technical assistance conference on how to write agreements that his staff contains as high as twenty persons involved in agreements with 300 LEAs. All the money is used from stipends; none goes to the schools for operating programs. (Author's observation, January 1981.)
57. National statistics show that in the fall of 1978, over 14,000,000 students were enrolled in grades 9-12. The latest year for which numbers are projected, Fall 1979, show that 94.2% of the 14-17 year age group are enrolled in schools. (Source: W. Vance Grant and G. George Lund, Digest of Education Statistics, 1979, (Washington, D.C.: National Center for Education Statistics, Department of Health, Education, and Welfare, 1979.)
58. Robert Taggart and Gregory Wurzburg, "The Role of Vocational Education in the Nation's New Youth Employment and Training Programs," September 29, 1977. Paper presented at Conference on "Vocational Education Addresses Unemployment--Program and Policy Alternatives", mimeograph, Washington, D.C., November 9-11, 1977, p. 13.
59. There is extensive literature on this topic. In particular, see Paul Berman and Milbrey McLaughlin, Federal Programs Supporting Educational Change, Vols. I-VIII (Santa Monica, California: The Rand Corporation, 1975-78); also Seymour B. Sarason, The Culture of the School and the Problem of Change (Boston: Allyn & Bacon, 1971.)
60. The Comprehensive Employment and Training Act of 1973, as Amended, P.L. 95-524, Sec. 2.
61. Annual Report to the Governor (Charleston, West Virginia: West Virginia State Manpower Services Council, 1976), p. 26.
62. U.S. Conference of Mayors, op. cit., p. 32.
63. For a discussion of this issue with respect to vocational rehabilitation and CETA program coordination, see Coordinating MRC and CETA Services: A Functional Approach (Boston: Department of Manpower Development, Executive Office of Community Affairs, The Commonwealth of Massachusetts, September 1979).

64. William Mirengoff and Lester Rindler, The Comprehensive Employment and Training Act: Impact on People, Places and Programs (Washington, D.C.: National Academy of Sciences, 1976), p. 78.
65. Randall Ripley, The Implementation of CETA in Ohio, R&D Monograph No. 44 (Washington, D.C.: Employment and Training Administration, U.S. Department of Labor, 1977); p. 38.
66. Garth Mangum and John Walsh, Employment and Training Programs for Youth: What Works Best for Whom? (Washington, D.C.: Office of Youth Programs, Employment and Training Administration, U.S. Department of Labor, 1978), p. 178.
67. A similar concept appears among social service program planners and is referred to as the "continuum of services." For example, the Federal government provides for the needs of handicapped individuals in a variety of laws such as the Vocational Rehabilitation Act (VRA) and the Education for All Handicapped Children's Act (P.L. 94-142). Each act funds a variety of organizations such as secondary schools in the case of P.L. 94-142, and post-secondary institutions under the VRA. The "continuum of services" notion deals with how an individual transfers from secondary school to postsecondary and the fit between the two legislations that provide the funding for the programs. The topics could be extended to include other legislations that provide other support services such as Title XX of the Social Security Act and programs operated by CETA or the Veteran's Administration.
68. Robert Taggart, "Youth Knowledge Development: The Process and the Product", September 1980 (mimeograph).
69. The information produced under YEOPA is currently being reanalyzed to see what can be said about effects of different kinds of linkages. In particular, see Barbara Dunn and Robert Taggart, "An Anatomy of School-to-Work Transition Projects," mimeograph (Washington, D.C.: Youthwork, Inc., September 1980); also, Robert Taggart, "A Review of CETA Training: Implications for Policy and Practice" (Washington, D.C.: Center for Social Policy Studies, Washington University, June 26, 1981).
70. Comprehensive Employment and Training Act of 1973, as Amended, P.L. 95-524.
71. Vernon L. Beuke, et al., Implementation of the Education Amendments of 1976: A Study of State and Local Compliance and Evaluation Practices (Final Report to the National Institute of Education, NIE-400-78-0041, Washington, D.C.: The National Institute of Education, December 1980), p. 111.

72. U.S. Conference of Mayors, op. cit., p. 19.

73. Improvement of CETA/Educational Linkages (Harrisburg, Pennsylvania: Pennsylvania Department of Education, October 1980).

74. Beuke, et al., op. cit., p. 115-120.

75. Beuke, et al., op. cit., p. 112-115.

76. U.S. Conference of Mayors, op. cit., p. 35.

77. Beuke, et al., op. cit., p. 115-118.

78. Wilken and Brown, op. cit., p. 13.

79. Analyses of Titles I, II, and IV of the Comprehensive Employment and Training Act of 1973 for Fiscal Year 1978, op. cit., p. 20.

80. Employment and Training Administration Glossary of Program Terms and Definitions, op. cit., p. 45..

81. Employment and Training Report of the President, 1979 (Washington, D.C.: U.S. Department of Labor), p. 157.

82. Wilken and Brown, op. cit., p. 14.

83. Paul L. Franklin, The Comprehensive Employment and Training Act: A Guide for Educators (New York: College Entrance Examination Board, 1979), p. 2.

84. Vocational Education Study, The Final Report of the Vocational Education Study (Washington, D.C.: National Institute of Education, September 1981).

85. William Mirengoff, et al., CETA: Assessment of Public Service Employment Programs (Washington, D.C.: National Academy of Science, 1980), p. 147.

86. Wisconsin Research Coordinating Unit, Cooperation Between Vocational Education and CETA (Madison, Wisconsin: Wisconsin Board of Vocational, Technical, and Adult Education, January 1979).

87. Jacques Nacson and Ella Mizell Kelly, Vocational Education: Meeting the Needs of Special Populations (Final Report to the National Institute of Education, NIE-400-79-0012, Washington, D.C.: The National Institute of Education, January 1981), p. 251.

88. Center for Policy Research, CETA and Rural Areas (Washington, D.C.: National Governor's Association, June 1979).
89. Brower, op. cit., pp. 1-16.
90. Ibid., p. II-45.
91. States have laws that provide services for the same populations to be served. For example, California has recently implemented the California Work-site and Employment Training Act which has made an impact on postsecondary programs.
92. For further discussion, see Awakening the Slumbering Giant: Intergovernmental Relations and Federal Grant Law (Washington, D.C.: Advisory Commission on Intergovernmental Relations, December 1980).
93. Federal Register, Vol. 42, No. 191, p. 53864, October 3, 1977. CETA employs a much more detailed and inclusive definition, structured differently from the VEA's. Coming from a family that qualified for public assistance makes one eligible for training. Under the VEA, the family has to have received public assistance. Furthermore, the CETA legislation deals with individuals affected by statutes which act as "significant barriers to employment," such as institutionalized and handicapped persons. (See Federal Register, Vol. 44, No. 65, p. 19998, April 3, 1979). The most obvious difference in definition lies in the process of identification. While public education institutions can readily identify persons with academic disadvantages, they do not keep records which show economic disadvantage.
94. A Guide for Correctional Administrations to U.S. Department of Education Resources, mimeograph (Washington, D.C.: Corrections Program, Office of Vocational and Adult Education, U.S. Department of Education), 1981.
95. CETA Journey: A Walk on the Women's Side (Washington, D.C.: Women's Bureau, U.S. Department of Labor, 1980).
96. A Guide for Linking Comprehensive Vocational Services (Sacramento, California: California Advisory Council on Vocational Education, undated document).
97. Youth Employment Education Unit, op. cit., pp. 59-61.
98. The Federal Role in the Federal System: The Dynamics of Growth, Vol. I, "The Crisis of Confidence" (Washington, D.C.: Advisory Commission on Intergovernmental Relations, July 1980), p. 4.

99. Frederick H. Harbison, Toward a Comprehensive Human Resources Policy (Washington, D.C.: National Council on Employment Policy, June 1976), p. 2.
100. Mirengoff and Rindler, op. cit., p. 5.
101. Paul R. Donnel, et al., Targeting Community Development (Washington, D.C.: U.S. Department of Housing and Urban Development, January 1980), p. 1.
102. Block Grants: A Comparative Analysis (Washington, D.C.: Advisory Commission of Intergovernmental Relations, October 1977).
103. Another view of looking at coordination is merely list the various Federal efforts to confront a social issue. This was the case of the Carter Urban Policy in the 1980 President's National Urban Policy Report (Washington, D.C.: Department of Housing and Urban Development, 1980).
104. Janet Weiss, "Substance vs. Symbol in Administrative Reform: The Case of Human Services Coordination," Policy Analysis, no. 7 (Winter 1981), pp. 21-45.
105. Lawrence D. Brown and Bernard J. Frieden, "Guidelines and Goals in the Model Cities Program," Policy Sciences, no. 7 (1976), pp. 474.
106. Ibid., p. 485.
107. Youth Act of 1980; 96th Congress, 2nd Session, H.R. 6711.

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